



**Via Electronic Submission**

November 15, 2023

Grid Modernization Advisory Council  
c/o Elizabeth Mahony, Commissioner  
Department of Energy Resources  
100 Cambridge Street  
Boston, MA 02110

**RE: Grid Modernization Advisory Council Draft Recommendations**

Chair Mahoney and Members of the Grid Modernization Advisory Council:

On behalf of the Northeast Clean Energy Council (“NECEC”), thank you for the opportunity to provide comments on *Observations and Recommendations of the Grid Modernization Advisory Council: Regarding Electric-Sector Modernization Plans*, released November 3, 2023.

NECEC is both a trade group representing all of the clean energy segments, and a mission-driven organization working to advance the just, equitable, and rapid transition to a clean energy future and a diverse climate economy. NECEC is dedicated to growing the clean energy economy in Massachusetts and across the region. Our nearly 300 members include companies based in Massachusetts and those from elsewhere who do business here or hope to make future investments in the state.

With the Electric-Sector Modernization Plan (“ESMP”) process, established by *An Act Driving Clean Energy and Offshore Wind* (“Climate Law”) in 2022, Massachusetts has an opportunity to chart a decisive course towards a just and equitable clean energy future that relies on a distribution system that reflects our dynamic, modern energy system. Through our comments below, and through the efforts of the Grid Modernization Advisory Council (“GMAC”), the Electric Distribution Companies (“EDCs”), the Healey-Driscoll administration, the Department of Public Utilities (“DPU”), and the legislature, we are hopeful that the eventual approval and implementation of the

ESMPs will mark a significant step forward in achieving our clean energy aspirations – safely, affordably, and reliably.

NECEC commends the GMAC for running an intensive, inclusive and transparent process. The GMAC has conducted a thorough review of the draft ESMPs and has developed a strong set of draft recommendations. Additionally, NECEC thanks the EDCs for their draft plans and their engagement throughout the process. Moving forward, NECEC encourages continued engagement with a broad set of stakeholders and highlights the significance of ongoing development and improvement of plans and processes to realize the intent of the Climate Law.

Based on the draft ESMPs, the work of the GMAC to date, and the draft recommendations of the council, NECEC offers comments below focused on three areas: process and stakeholder engagement; the need for proactive long-term distribution system planning; and technology modernization.

### **Process and Stakeholder Engagement**

The GMAC process and the review of the draft ESMPs to date has been robust, accessible, and substantive. However, this is a novel process and will require intentional and iterative improvements to ensure long-term success, and it is important that meaningful engagement continues after the ESMPs are filed with the DPU. Sustained engagement with stakeholders – including the public, the clean energy development community, and advocacy organizations – is essential, both throughout the DPU process and after the DPU acts on the proposed ESMPs.

NECEC agrees with the *Draft GMAC Report – 11/3/23*, which states in Section 4: “It is imperative that the DPU investigate and implement rules and procedures for future ESMP iterations to efficiently evolve the ESMP process to best meet its intended purpose under law and the Commonwealth’s clean energy policies and objectives.” NECEC also supports the suggestion from GMAC member Kathryn Wright that process recommendations be made in the report itself, including:

- The need for collaborative forecasting and model development;
- The need for time to better understand alternative financing and alternative projects;
- And the need for deeper public education and engagement based on the current grid state and forecasting results for each region.

In addition to including initial process recommendations in the report, NECEC encourages the GMAC to develop additional recommendations for continued GMAC process and stakeholder engagement at all levels between ESMP filings and in future ESMP cycles. Thoughtful, well-planned grid expansion and modernization is at the core of the just, equitable and rapid transition to a clean energy future. This process is too crucial to happen in isolation every five years. Instead, it is important to build out a comprehensive process that provides opportunities for external stakeholders and experts to meaningfully participate in both the implementation of approved ESMPs and the development of future ESMPs.

NECEC also supports the recommendations of the GMAC Equity Working Group provided in the *Memorandum of the Equity Working Group – 11/3/23* and encourages the full GMAC to adopt these recommendations on behalf of the entire body. We particularly emphasize the need for public-facing materials to be reviewed for plain-spoken language, visualizations, clarity, and completeness. Engagement with the public that is accessible and inclusive will be instrumental in ensuring the long-term success of the ESMP process.

Finally, NECEC supports recommendations 10, 11 and 12 related to the proposed Community Engagement Stakeholder Advisory Group (“CESAG”). We appreciate the proposal by the EDCs to form the CESAG but agree with the members of the GMAC that it is important to have this advisory group live within the structure of the GMAC, be led jointly by the EDCs and the GMAC, and develop definitions of equity, establish quantifiable metrics, and provide clear explanations of the stakeholder process. Just as continued, meaningful stakeholder engagement is needed for the ESMPs to lead to a successful outcome, it is equally important to ensure that these engagement efforts are well-coordinated and thoughtfully planned as part of a clear, consistent and unified strategy.

### **Proactive Long-term Distribution System Planning**

To meet Massachusetts’ decarbonization goals and the intent of the Climate Act, our distribution grid must be open to the speedy interconnection of distributed energy resources of all kinds, not the barrier that it is so often today. Reducing the timelines and current uncertainty of the process to interconnect will go a long way to increasing the reliability and resilience of our grid and is essential to facilitate the transition to a clean energy future. This will require an interconnection process and cost allocation methodology that is proactively planned, fast, low-cost, and predictable.

The Provisional System Planning Program established under D.P.U. 20-75 was a significant step forward for the interconnection process in Massachusetts. That said, the Provisional Program and the resulting capital investment project proposals were still fundamentally reactive in nature, and the DPU emphasized the need to transition to a proactive long-term distribution system planning process.

In the order approving the Marion-Fairhaven Capital Investment Project in docket D.P.U. 22-47, DPU wrote: "Recent legislation enacted on August 11, 2022, the 2022 Clean Energy Act, establishes a new framework requiring the Distribution Companies to submit five-year electric-sector modernization plans for review and input by a Grid Modernization Advisory Council and subsequent review by the Department. One objective of these plans is to proactively upgrade the distribution system to enable increased, timely adoption of renewable energy and DG, and shall include a description of "alternative approaches to financing proposed investment, including, but not limited to, cost allocation arrangements between developers and ratepayers."

The ESMPs, however, propose to continue with capital investment projects rather than moving to a holistic, unified, and truly proactive approach. While we recognize that there will need to be a transition period as the department considers the remaining capital investment project proposals, it is also critical that the ESMPs address how the EDCs propose to move to a proactive planning process and develop a long-term cost allocation methodology.

As such, NECEC strongly supports the proposed revisions to recommendation 3 provided by GMAC member designee Kate Tohme, which are included in the *Draft GMAC Report – Meeting Version* that was discussed in the GMAC meeting on November 9, 2023. In particular, we agree that:

- The proactive planning process should be as uniform across all three EDCs as possible, ensuring coordination of overarching assumptions and DER stakeholder engagement.
- The proposed long-term proactive distribution system planning process for the interconnection of distributed generation should include factors that drive development of distributed generation by enabling hosting capacity in locations that benefit the Commonwealth as a whole and further the state's clean energy objectives.
- Factors should include land use, siting near load, and coordination with infrastructure upgrades necessary to meet overarching clean energy goals.

- Proactive planning should account for existing group studies and queue, as well as creating hosting capacity to meet service territory and subregion pro rata shares of DER development needed to meet the Commonwealth's objectives.
- Planning should account for the lapse in time between enabling hosting capacity and achieving installed capacity.
- The ESMPs should propose a long-term cost allocation methodology for proactive infrastructure upgrades to enable the interconnection of distributed generation to succeed the reactive investment approval process conducted through the Provisional System Planning Program.
- The ESMPs should contemplate both a cost allocation methodology for medium and large DG and for small residential DG facilities.
  - If this is not possible before the January filing, then the EDCs should submit a detailed proposal and timeline for a stakeholder process that will develop a long-term cost allocation methodology.
  - This proposal should include how the stakeholder engagement and discussion will occur in parallel to the ESMP proceedings and should propose a date by which the EDCs will file a long-term cost allocation proposal at the DPU.
- The EDCs should submit a detailed proposal for streamlining of CIPs over the next 5 years, including incorporation of proactive system planning in advance of the next ESMP process.

NECEC welcomes the opportunity to engage with EDCs, the GMAC, industry members, and other stakeholders to develop a forward-looking and long-lasting interconnection and cost allocation methodology.

### **Technology Modernization**

The draft ESMPs include some discussion of the potential for new technologies, such as Advanced Distribution Management Systems (“ADMS”), Volt VAR Optimization (“VVO”), Distributed Energy Resource Management Systems (“DERMS”), and Advanced Metering Infrastructure (“AMI”), which will unlock additional capacity, resilience, and ability to manage a modernized grid. While we understand that the EDCs are working with a group of interested stakeholders to schedule a meeting in December for a focused discussion on this topic, we also ask that the ESMPs filed with the DPU in January provide more specific details about the ways in which they intend to implement

these new technologies, including the earliest possible timeline for implementation. In particular, we ask the EDCs to address the following questions:

- What are the specific intended uses of DERMS to enable DERs and electrification?
- In what ways could VVO with AMI technologies and other capabilities of advanced inverters be used to mitigate upgrades required to interconnect in the absence of DERMS?
- Will DERMS be used to enable DER to manage distribution-level voltage issues?
- To what extent is it possible to allow for the management and interaction between different technologies and use cases instead of designing for the worst case, or to design for some level of management using DERMS?
- Do the EDCs have plans, prior to the full-scale implementation of DERMS, to use DERs to shift energy from low load hours to high load hours, which can provide benefits to substation equipment on circuits with large levels of DG generation?
- To what degree can behind-the-meter energy storage help enable electrification by supporting the system's electricity needs during peak periods?

We recognize that these are complex issues and that it may not be possible at this moment to enumerate all potential future uses or configurations of emerging grid technologies. At the same time, we ask that the final ESMPs provide more specific details and timelines for implementation.

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On behalf of NECEC and our members, thank you for the opportunity to provide comments. We are happy to answer any questions you might have.

Sincerely,

/s/ Tim W. Snyder

Tim W. Snyder

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Northeast Clean Energy Council

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